

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DU'BOIS A. CROCKROM, individually and)	
on behalf of all others similarly situated,)	Civil Action No. 1:20-cv-00013-JPO
)	
Plaintiff,)	Judge J. Paul Oetken
)	
v.)	Magistrate Judge Debra C. Freeman
)	
BANK OF AMERICA, N.A. and BANK OF)	
AMERICA CORPORATION,)	(ELECTRONICALLY FILED)
)	
Defendants.)	

**DEFENDANTS' NOTICE OF MOTION TO
DISMISS AND TO STRIKE PLAINTIFF'S COMPLAINT**

PLEASE TAKE NOTICE that Defendants Bank of America, N.A. and Bank of America Corporation ("BAC") respectfully move the Court to dismiss the Complaint pursuant to Fed. R. Civ. P. 12(b)(6), to dismiss the claims against BAC pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6), and to strike the Complaint's nationwide class allegations pursuant to Fed. R. Civ. P. 12(f), in support of which Defendants rely on the accompanying Memorandum of Law, Declaration, and the exhibit thereto.

DATED: February 4, 2020

/s/ Angela A. Smedley

Angela A. Smedley
WINSTON & STRAWN LLP
200 Park Avenue
New York, New York 10166
Tel: (212) 294-5348
Fax: (212) 294-4700
ASmedley@winston.com

Kobi Kennedy Brinson (*pro hac vice pending*)
WINSTON & STRAWN LLP

300 South Tryon Street, 16th Floor
Charlotte, North Carolina 28202
Tel: (704) 350-7747
Fax: (704) 350-7800
KBrinson@winston.com

Ryan Dunigan (*pro hac vice pending*)
Ross J. Corbett (*pro hac vice pending*)
WINSTON & STRAWN LLP
35 West Wacker Drive
Chicago, IL 60601
Tel: (312) 558-3213
Fax: (312) 558-5700
RDunigan@winston.com
RCorbett@winston.com

*Counsel for Defendants Bank of America, N.A.
and Bank of America Corporation*